

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re Application of Vale S.A., Vale Holdings B.V., and Vale International S.A. for an Order Pursuant to 28 U.S.C. § 1782 to Conduct Discovery for Use in Foreign Proceedings.

Case No. 1:20-mc-00199(JGK)(OTW)

**STIPULATION REGARDING  
PROTECTIVE ORDER**

WHEREAS, on October 6, 2020, counsel for Vale S.A., Vale Holdings B.V., and Vale International S.A. (collectively, “Vale”) and certain other parties executed a Stipulation and Protective Order (the “Protective Order”);

WHEREAS, on October 7, 2020, the Court so-ordered the Protective Order (D.E. 69);

WHEREAS, on March 16, 2021, Vale moved for leave to serve a subpoena (the “Subpoena”) on Signa Chrysler Holding LLC (“Signa”) (D.E. 90) and, on June 22, 2021, the Court granted that motion (D.E. 91);

WHEREAS Vale and Signa agree that the Protective Order shall govern any document production made by Signa in response to the Subpoena;

IT IS HEREBY ORDERED that the Protective Order shall apply to any document production made by Signa in response to the Subpoena.

**SO STIPULATED AND AGREED.**

Dated: August 4, 2021

CLEARY GOTTlieb STEEN &  
HAMILTON LLP

By: /s/ Jeffrey A. Rosenthal  
Jeffrey A. Rosenthal  
Lisa M. Schweitzer  
Lisa Vicens

One Liberty Plaza

McDERMOTT WILL & EMERY LLP

By:   
\_\_\_\_\_  
Andrew B. Kratenstein  
Monica S. Asher

One Vanderbilt Avenue  
New York, New York 10017

New York, New York 10006  
T: 212-225-2000  
F: 212-225-3999  
jrosenthal@cgsh.com  
lschweitzer@cgsh.com  
evicens@cgsh.com

T: (212) 547-5400  
F: (212) 547-5444  
akratenstein@mwe.com  
masher@mwe.com

*Attorneys for Signa Chrysler Holding LLC*

*Attorneys for Vale S.A., Vale Holdings B.V.,  
and Vale International S.A.*

**SO ORDERED.**

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**Ona T. Wang**  
United States Magistrate Judge

Dated: \_\_\_\_\_, 2021\_\_\_\_\_  
New York, New York